

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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JUN 28 2021

CLERK, U.S. DISTRICT COURT  
ST. PAUL, MN

United States of America

Crim No. 11-CR-386-(MJD)

V

Plaintiff,

Okwuchukwu Emmanuel Jiddefor

Defendant

SCANNED

JUN 29 2021 wps

Rule 45(c)(2)  
Fed. R. Crim. P.

U.S. DISTRICT COURT ST. PAUL

DEFENDANT'S MOTION FOR GOVERNMENT and  
Agencies Disclosure produce Records  
Compel and a subpoena and For Sanction

Defendant Okwuchukwu Emmanuel Jiddefor moves  
the Court for an order requiring the government to  
the following information.

The following records and documents, source of inform

- ① Interviews, Proffers, and Communications of  
with or United States Attorney's Office and  
Agencies, U.S. Secret Service Agent(s)/Internal Revenue  
Service Agent United States Postal Inspection  
Agent(s), Immigration Customs and Enforcement Agent  
Minnesota Financial Crimes Task Force Agent(s)  
Minnesota Department of Public Safety and  
Driver's Vehicle Services (DVS) (DEA)  
Sheriff's Deputy and Minneapolis Police Departments  
Department of Justice Law Enforcement Agency Field Manager  
Federal Prosecuting Office, Chief Federal

② Notes, Reports of Investigations, memoranda, letters, movement/transfer documents per day  
Financial documents (including requests for payment)  
and any audio or video recording Search Warrant  
affidavit any and Surveillance Video, Title III  
Wiretaps authorized or utilized in the investigation  
Concerning Okwuchukwu E Jidofor (DOB 3/7/1984) From  
December 9 2009 through February 2014

③ Defendant's motion to compel seeks an order requiring Government and Agencies to produce for his inspection all material identified by the subpoena and undercover surveillance records not Compel of Okwuchukwu E Jidofor with Agent.

④ to disclosed many as ten proffer interviews with the government.

⑤ To disclosed surveillance in the area Foot traffic in the area and locations, cell phone or GPS agencies were tracking, Investigators located.

⑥ To disclosed all data of Okwuchukwu E Jidofor 5/1/84 any all activity that ie databases including but not limited to Federal, State, or local law.

⑦ To disclosed Search warrant affidavits or NCIC arrest, extradition filed December 2009 - 2014 any issuing District.

- ⑧ To disclosure Produce Records Confidential Informant Review Committee or (IRC) investigatory information relating to electronic surveillance, search warrant
- ⑨ To disclosure order See 28 CFR §§ 16.21 - 16.29 and Reports or written Initial Suitability Report and Recommendation and (II)(A)(1) (IV)(B)(2) (II)(A)(3)(a)
- ⑩ To disclosure Produce Records (C) 10-1301 Okwuchukwu Jidefor 5/7/84 Consensual monitored and Recorded undercover Meeting or authorized to engage in activity (II)(C)(4)
- ⑪ To disclosure Produce Records (C) 10-1301 Okwuchukwu Jidefor 5/7/84 Participants in the Witness Security Program authorization.
- ⑫ To disclosure Produce Records Probation, Supervision authority or Permission and Quintin Billingslea (C) 10-1301 Okwuchukwu documented in the Tiddefor 5/7/84 Files.
- ⑬ To disclosure Produce Records USSS | MNFTF | Communications any Federal State, or local from 2014 - 2016 Law Enforcement agency
- ⑭ To disclosure Produce Records engage in any business or financial transactions with a (C) 10-13-01 Okwuchukwu Jidefor 5/7/84 authorized approval in a good manner.

- (16) All copies record whether Federal, State or local documentation of payments receiving sign or initia and date a written receipt - information, services, or expenses. Payment of monies to the (C1) 10-1301 Okwuchukwu Jidofor 5/7/84 (III) (B) (3) -(5)
- (17) To discovery all the names and addresses of participants in an act designed to obtain information for the FPD would be unlawful and authorize a (C1) 10-1301 Okwuchukwu Jidofor and conducted by a law enforcement agent (e.g. breaking and entering, illegal wiretapping, illegal opening or tampering with the mail, or trespass amounting to an illegal search). active.
- (18) To discovery all the (C1) 10-1301 is authorized to engage in Tier 1 or 2 otherwise illegal activity all copies described above and illegal activity. (C1) 10-1301 is authorized to engage in Tier 1 or 2 otherwise illegal activity and illegal activity.
- (19) To discovery all (C1) 10-1301 application and affidavit in support of an application to the court. (III) (P) (1) application and the (C1) 10-1301 application and affidavit in support of an application to the court.
- (20) To discovery all notification of investigation or prosecution of the (C1) 10-1301 Okwuchukwu E. Jidofor 5/7/84

(21) discovery any and all documentary, all statements, obtained Senior Field manager, age JLEA, FPD, (C1) Files.

THE EXHIBITS TO THIS MOTION ARE NUMBERED  
STARTING B1 ENDING AT B9

Okwuchukwu E. Jidoe for  
RTYfing  
13880 Business Center Dr  
Elk River MN 55330  
Suite 200  
June 18 2021